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 8 Test Systems, Inc. a California Corporation, and Silicon Test Solutions, LLC.

9
 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **SAN JOSE DIVISION**

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13 VERIGY US, INC, a Delaware Corporation)

Civil Case No.: C07-04330 RMW (HRL)

14 Plaintiff,)

15 vs.)

**DECLARATION OF RICHARD O.
 FOSTER, FORMERLY DIRECTOR
 OF MANUFACTURING FOR
 ANRITSU CORPORATION**

16 ROMI OMAR MAYDER, an individual,)
 17 WESLEY MAYDER, an individual,)
 18 SILICON TEST SYSTEMS, INC. a)
 California Corporation, SILICON TEST)
 19 SOLUTIONS, LLC, a California Limited)
 Liability Corporation, inclusive,)

Date: N/A
 Time: N/A
 Dept.: Judge: Hon. Judge Whyte

20 Defendants.)
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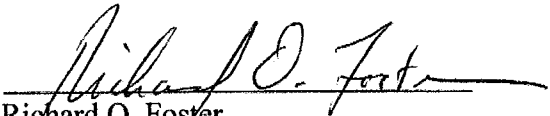
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1 I, Richard O. Foster, declare as follows:

- 2 1) I have personal knowledge of all the facts set forth in this declaration and, if called upon to
3 testify in this Court as to those facts, my testimony would be as stated herein.
- 4 2) I am now retired, but previously was Director of Manufacturing for Anritsu Company
5 ("Anritsu"), the North American subsidiary of Anritsu Corporation based in Tokyo, Japan.
6 As Director, I oversaw the manufacturing in Morgan Hill, CA of General Purpose Test
7 Equipment, and Precision Radio Frequency ("RF") and Microwave Components. One key
8 market for Anritsu was, and remains, Automated Test Equipment manufacturers, such as
9 Verigy and Teradyne (a Verigy competitor in ATE). I worked at Anritsu for over 20
10 years.
- 11 3) ATE systems have a probe card/board which interfaces between the ATE tester and the
12 Device Under Test ("DUT"). Most probe boards contain integrated circuits that allow the
13 tester to selectively transmit the same signal to different DUTS either simultaneous (called
14 fan-out) or sequentially (called time multiplexing). Integrated circuit switches, usually
15 field effect transistors ("FETS"), are used to implement the selective transmission of tester
16 channels.
- 17 4) During 1994 and 1995, Anritsu was asked by Teradyne to provide certain modules which
18 enhanced the capabilities of their testers. An internal strategic evaluation of this business
19 opportunity revealed that Teradyne's business (and therefore Anritsu's) could be
20 significantly impacted if additional switches (a technology already in use) were added to
21 the probe cards thus offloading the burden from the expensive ATE testers. This would
22 reduce the cost per channel for testing semiconductor wafers and chips. In this manner,
23 more devices under test ("DUTS") could be tested with the same number of tester
24 channels. Anritsu did not consider these ideas trade secrets because these
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1 techniques were well known and, in fact, were requested in the equipment being supplied
2 to Teradyne by Anritsu.
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4 I declare, under penalty of perjury the foregoing is true and correct, executed this 4th day
5 of October 2007 in Pismo Beach, California.
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7 
8 Richard O. Foster
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